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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

AARON ROBINSON,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

BRIAN URIBE, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about June 13, 2016, within the Eastern District of New York and elsewhere, the defendant AARON ROBISON did knowingly receive and distribute any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(2)).

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COMPLAINT

(T. 18, U.S.C. § 2252(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:

1. I am a Special Agent with Homeland Security Investigations. I have been employed by Homeland Security Investigations since 2001, and am currently assigned to the Child Exploitation Investigation Unit. I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to these types of investigations. As a result of my training and experience, I am familiar with the techniques and methods of operations used by individuals involved in criminal activity to conceal their activities from detection by law enforcement officers. As part of my responsibilities, I have been involved in the investigation of several child pornography cases and have reviewed photographs depicting children (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

2. I have personally participated in the investigation of the offense discussed below. I am familiar with the facts and circumstances of this investigation from: (a) my personal participation in this investigation, (b) reports made to me by other law enforcement authorities.

3. Homeland Security Investigations is investigating the possession, access with intent to view, transportation, receipt, distribution and reproduction of sexually explicit material relating to children, in violation of Title 18, United States Code, Sections 2252 and 2252A.

4. Peer to peer file sharing (“P2P”) is a method of communication available to Internet users through the use of special software. Computers linked together through the Internet using this software form a network that allows for the sharing of digital files between users on that network. A user first obtains the P2P software, which can be downloaded from the Internet. In general, P2P software allows the user to set up files on a computer to be shared with others running compatible P2P software. A user obtains files by opening the P2P software on the user’s computer, and conducting searches for files that are currently being shared on another user’s computer.

5. One aspect of P2P file sharing is that multiple files may be downloaded in parallel, which permits downloading more than one file at a time.

6. A P2P file transfer is assisted by reference to an IP address. This address, expressed as four sets of numbers separated by decimal points, is unique to a particular computer during an online session. The IP address provides a unique location making it possible for data to be transferred between computers.

7. Third party software (“Network Monitoring Program” or “Investigative Software”) is available to identify the IP address of the P2P computer sending the file. Such software monitors and logs Internet and local network traffic.

8. One investigative method employed in this investigation involves the use of an Investigative Software (“IS”), which is currently used in P2P file sharing investigations to directly download files of child pornography from P2P network users. The IS is designed to “direct connect” to one IP address and browse or download from one specific P2P network user at a time. The IS is a P2P file sharing software similar to other file sharing software used on P2P networks which are free and available to the public.

9. In January 2016, an HSI agent signed into a P2P network using IS computer software. The IS located a computer using the IP Address 24.228.93.157 ("IP Address") that was using the P2P network to make available certain hash values and files with file names that contained certain words generally known to be associated with child pornography images and videos, and which are known by law enforcement to match suspected child pornography hash values.

10. On or about June 13, 2016, the IS "direct connected" to the IP Address and displayed numerous files being hosted by the user of said IP address. Using the IS and P2P networks, the HSI agent downloaded numerous files from the computer at the IP Address to include the following:

- a. A wmv video file "52.wmv," approximately 1 min long, depicting a young prepubescent female on her hands and knees being penetrated by an adult male with his erect penis, from behind.
Hash Value:
SHA1=DE4A7DDE2E5ADF7D183EDBF9D233D8B0DCB61CC;
- b. An avi file named "9Yo Arab Pede Girl Fucked By Dad.avi", approximately 1 min long and 1 second, depicting a nude prepubescent female wearing sunglasses while standing in a shower. The scene switches to show the same female lying on a bed with towel covering her. The towel is pulled off, exposing her nude body, while an adult male penis is seen rubbing against her vagina. The scene again switches, depicting the same female sitting on an adult male as he appears to have intercourse with her. The scene again switches to depict an adult male rubbing his penis against her vagina, with the female eventually masturbating the male penis. Hash Value:
SHA1=E519ED6A3F9CCDE60642AD6B151ABD6B94597747
- c. An mpeg file named "(Children-Sf-1Man) Pthc- Norma Latinos Girl 12 Yo Fuck and Suck.mpg", approximately 4min and 43 seconds long, depicting a young prepubescent female child performing oral sex on an adult male. Approximately 54 seconds into the video, she gets on top of the male as he rubs his penis against the female's vagina until he ejaculates. At approximately 4 minutes, 16 seconds the video depicts numerous images of the female laying on a bed

spreading her legs exposing her genitals. Hash Value:
SHA1=A34FB0EC6B350217418981FD0FA58B75D90A842A

- d. An avi file named “!!!New!!! (Pthc) Nina 2 (7Yo Bj) And 7Yo Suck 2.avi”, approximately 2 minutes, 13 seconds long, depicting a young prepubescent female laying naked on a bed. At approximately 20 seconds, an adult hand comes into the frame and repositions the female. At approximately 57 seconds, an adult male penis is inserted into her mouth and the male masturbates into her mouth. Hash Value:
SHA1=1EBAF2EBC73211E66421092F86864C39D6DD9241

11. Records from Optimum Online revealed that the account using the IP Address during January of 2016 is registered to the defendant AARON ROBINSON at an address in Brooklyn, New York (“the PREMISES”). Optimum Online records further revealed that said account is currently active.

12. A search of public records and law enforcement databases revealed that the defendant AARON ROBINSON currently resides at the PREMISES.

13. On September 14, 2016, HSI agents executed a search warrant, issued on September 9, 2016 by the Honorable Viktor V. Pohorelsky, at the PREMISES.

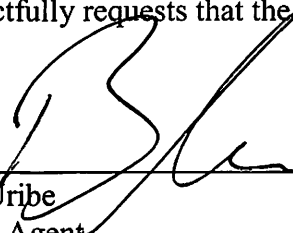
14. The defendant AARON ROBINSON resides alone and was present when HSI executed the search warrant. Agents provided a copy of the search warrant and items to be seized to the defendant to read. The agents informed the defendant that they were there to execute the search warrant. Agents advised the defendant of his Miranda rights. He stated that he understood his rights and indicated that he wanted to speak to agents without a lawyer present.

15. The defendant AARON ROBINSON stated, in sum and substance and in part, that he lives at the PREMISES and used a computer located there to search for and download images of child pornography. The defendant further stated, in sum and substance

and in part, that he was the only individual who lived at the PREMISES. Finally, the defendant stated, in sum and substance, that he used P2P software to obtain and view child pornography. A preliminary search of two external storage devices revealed files containing child pornography.

16. HSI agents then placed the defendant under arrest.

WHEREFORE, your deponent respectfully requests that the defendant AARON ROBINSON be dealt with according to law.



Brian Uribe
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
14th day of September, 2016

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